

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re) Chapter 7
)
PATRICK Y. LIU,) Case No. 06-09948
)
Debtor.) Honorable Jacqueline P. Cox
)
) Hearing Date: July 21, 2015
) Hearing Time: 9:30 a.m.

**COVERSHEET FOR FINAL APPLICATION OF SHAW
FISHMAN GLANTZ & TOWBIN, LLC, AS COUNSEL FOR THE TRUSTEE,
FOR ALLOWANCE AND PAYMENT OF COMPENSATION AND
REIMBURSEMENT OF EXPENSES AND FOR RELATED RELIEF**

Name of Applicant:	Shaw Fishman Glantz & Towbin, LLC			
Authorized to Provide Professional Services to:	Trustee			
Date of Order Authorizing Employment:	October 2, 2013			
Period for Which Compensation is Sought:	September 7, 2013 – June 30, 2014			
Amount of Fees Sought:	\$13,129.50			
Amount of Expenses Sought:	\$444.21			
This is a(n): <input type="checkbox"/> Interim Application <input checked="" type="checkbox"/> Final Application				
If this is <u>not</u> the first application filed herein by this professional, disclose as to all prior fee applications:				
Date Filed	Period Covered	Total Requested (Fees and Expenses)	Total Allowed	Any Amount Ordered Withheld

The aggregate amount of fees and expenses paid to the Applicant to date for services rendered and expenses incurred herein is: -0-

Applicant: Shaw Fishman Glantz & Towbin LLC

Date: June 24, 2015

By: /s/ Ira Bodenstein

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NOTICE OF MOTION

TO: SEE ATTACHED SERVICE LIST

PLEASE TAKE NOTICE that, on July 21, 2015, at 9:30 a.m., we shall appear before the Honorable Jacqueline P. Cox, Courtroom 680, Dirksen Federal Building, 219 South Dearborn Street, Chicago, Illinois, or anyone sitting in his stead, to present the FINAL APPLICATIONS OF SHAW FISHMAN GLANTZ & TOWBIN LLC, AS COUNSEL FOR THE TRUSTEE and POPOWCER KATTEN as ACCOUNTANTS FOR TRUSTEE, FOR ALLOWANCE AND PAYMENT OF COMPENSATION AND REIMBURSEMENT OF EXPENSES AND FOR RELATED RELIEF (the "Applications"), at which time and place you may appear if you so desire.

The Fee Applications seek allowance and payment of \$13,129.50 in legal fees and \$444.21 in expenses, to be paid to counsel for the Trustee, Shaw Fishman Glantz & Towbin LLC and \$1,450.00 in fees for Popowcer Katten. Copies of the Applications can be obtained via the PACER website maintained by the U.S. Bankruptcy Court for the Northern District of Illinois, or by contacting the undersigned counsel.

Date: June 24, 2015

Shaw Fishman Glantz & Towbin LLC

By: /s/ Ira Bodenstein

Ira Bodenstein (#3126857)
Shaw Fishman Glantz & Towbin LLC
321 North Clark Street, Suite 800
Chicago, Illinois 60654
(312) 541-0151 telephone
(312) 980-3888 facsimile

CERTIFICATE OF SERVICE

Ira Bodenstein, an attorney, hereby certifies that he caused a true copy of the foregoing notice to be served via the methods indicated below on this 24th day of June, 2015.

/s/ Ira Bodenstein

SERVICE LIST

Mailing Information for Case 06-09948

Electronic Mail Notice List

The following is the list of **parties** who are currently on the list to receive email notice/service for this case.

- David S Adduce dadduce@komdr.com
- Ira Bodenstein iratrustee@shawfishman.com, IL29@ecfcbis.com;cowens@shawfishman.com
- Ira Bodenstein ibodenstein@shawfishman.com, cowens@shawfishman.com
- Marc J. Chalfen mchalfen@komdr.com
- Joseph E Cohen jcohen@cohenandkrol.com, jcohenattorney@gmail.com;gkrol@cohenandkrol.com;jneiman@cohenandkrol.com;trotman@cohenandkrol.com
- Richard M. Fogel rfogel@shawfishman.com
- E. Philip Groben pgroben@cohenandkrol.com, trotman@cohenandkrol.com;jneiman@cohenandkrol.com
- Michael J Kalkowski mkalkowski@fisherandshapirolaw.com, BK_IL_Notice@fisherandshapirolaw.com
- Patrick S Layng USTPRegion11.ES.ECF@usdoj.gov
- Jose G Moreno nd-one@il.cslegal.com
- Andrew J Nelson anelson@atty-pierce.com, northerndistrict@atty-pierce.com
- Gregory K Stern gstern1@flash.net, steve_horvath@ilnb.uscourts.gov

Via U.S. Mail

Patrick Y. Liu
1203 W. Flournoy
Chicago, IL 60607-3325

Citimortgage, Inc.
c/o Codilis and Associates
15W030 North Frontage Road
Suite 100
Burr Ridge, IL 60527-6921

LVNV Funding LLC its successors and assigns
c/o Resurgent Capital Services
P.O. Box 10587
Greenville, SC 29603-0597

Roundup Funding, LLC
MS 550
P.O. Box 91121
Seattle, WA 98111-9221

U.S. Bankruptcy Court
Eastern Division
219 South Dearborn Street, 7th Floor
Chicago, IL 60604-1702

American Express
P.O. Box 360002
Fort Lauderdale, FL 33336-0002

American Express Centurion Bank
P.O. Box 3001
Malvern, PA 19355-0701

Associated Recovery Systems
P.O. Box 469046
Escondido, CA 92046-9046

American Express Bank FSB
c/o Becket and Lee LLP
P.O. Box 3001
Malvern, PA 19355-0701

University Club of Chicago
76 E. Monroe Street
Chicago, IL 60603-2702

Countrywide Home Loans, Inc.
Bankruptcy Department
1544 Old Alabama Road
Roswell, GA 30076-2102

Real Time Environmental Inc./Jasper OFOMA
5644 S. Commercial Avenue
Chicago, IL 60617-5021

Smithbuilt Financial, LLC.
3030 NW Expressway, Ste. 1313
Oklahoma City, OR 73112-5466

ABN AMRO Mortgage
8201 Innovation Way
Chicago, IL 60682-0082

American Express Bank FSB
P.O. Box 3001
Malvern, PA 19355-0701

Ann G. Liu
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Chicago, IL 60607-3325

American Express
P.O. Box 650448
Dallas, TX 75265-0448

American Express Centurion Bank
c/o Becket and Lee LLP
P.O. Box 3001
Malvern, PA 19355-0701

American Express Travel Related Services Co
c/o Becket and Lee LLP
P.O. Box 3001
Malvern, PA 19355-0701

BAC Home Loans Servicing LP
fka Countrywide Home Loans Servicing LP
c/o MCalla Raymer, LLC
1544 Old Alabama Road
Roswell, GA 30076-2102

Beneficial Finance
P.O. Box 17574
Baltimore, MD 21297-1574

Bloomington's
P.O. Box 183083
Columbus, OH 43218-3083

Bd. Of Ed. Of Calumet City School District 1
c/o Samuel B. Cavnar
55 W. Monroe Street, #800
Chicago, IL 60603-5144

Beneficial
P.O. Box 10640
Virginia Beach, VA 23450-0640

Capital One Bank
P.O. Box 790216
Saint Louis, MO 63179-0216

Citibank
P.O. Box 469100
Escondido, CA 92046-9100

Citibank Platinum Select Card
P.O. Box 688910
Des Moines, IA 50368-8910

Citimortgage, Inc.
4740 121 Street
Attn: Reception Payments NC 1156-7
Urbandale, Iowa 50323

Calumet City School District 155
540 Superior Avenue
Calumet City, IL 60409-3453

Capital One
P.O. Box 30285
Salt Lake City, UT 84130-0285

Chase Bank USA, N.A.
c/o Weinstein & Riley, P.S.
2101 4th Avenue, Suite 900
Seattle, WA 98121-2339

Joseph E. Cohen
E. Philip Groben
Cohen & Krol
105 West Madison Street
Suite 1100
Chicago, IL 60602-4600

Countrywide Home Loans
P.O. Box 650225
Dallas, TX 75265-0225

Countrywide Home Loans, Inc.
Bankruptcy Department
400 Countrywide Way
Simi Valley, CA 93065

Countrywide Home Loans, Inc.,
McCalla, Rayme
1544 Old Alabama Road
Roswell, GA 30076-2102

Diners Club
P.O. Box 6067
The Lakes, NV 89163-6067

FDS Bank/Bloomington
c/o TSYS Debt Management
P.O. Box 137
Columbus, GA 31902-0137

Federated Retail Holdings, Inc./Marshall
Fields
c/o TSYS Debt Management
P.O. Box 137
Columbus, GA 31902-0137

Great Lakes Soil & Environmental Consultants
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Bolingbrook, IL 60440-5132

Harris N.A.
P.O. Box 0755
Chicago, IL 60690-0755

Hilco Receivables, LLC
1120 Lake Cook Road, Ste. A
Buffalo Grove, IL 60089-1970

Hilco Receivables LLC
Assignee of Wells Fargo Bank by eCAST
Settlement Corporation as its agent
P.O. Box 35480
Newark, NJ 07193-5480

HSBC
P.O. Box 17313
Baltimore, MN 21297-1313

Innerspace Environmental Assess Inc.
42w612 Still Meadows Lane
Elburn, IL 60119-9509

Internal Revenue Service
Centralized Insolvency Operations
P.O. Box 7346
Philadelphia, PA 19101-7346

Innerspace Environmental Assessment Inc.
c/o Edgerton & Edgerton Atty for Crdr
125 Wood Street, P.O. Box 218
West Chicago, IL 60166-0218

Jasper Oforma
d/b/a Real Time Environmental, Inc.
P.O. Box 267955
Chicago, IL 60626-7355

Attn: Bankruptcy Department
JPMorgan Chase Bank NA
P.O. Box 3155
Milwaukee, WI 53201-3155

Juniper
P.O. Box 13337
Philadelphia, PA 19101-3337

Kimberly Duda
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Chicago, IL 60603-1413

Macy's
P.O. Box 689195
Des Moines, IA 50368-9195

MBNA America
P.O. Box 15137
Wilmington, DE 19886-5137

MBNA America (Delaware), N.A.
c/o Countrywide Home Loans, Inc.
400 Countrywide Way, Mail Stop SV-46
Simi Valley, CA 93065

Office of the U.S. Trustee
219 South Dearborn Street, Rm 873
Chicago, IL 60604-2027

PYOD, LLC its successors and assigns as
assignee of Roundup Funding L.L.C.
Resurgent Capital Services
P.O. Box 19008
Greenville, SC 9602-9008

Portfolio Recovery Associates LLC
P.O. Box 41047
Norfolk, VA 23541-1067

Smithbuilt Financial/National Loan
c/o Marc J. Chalfen and David S. Adduce
30 South Wacker Drive, Ste. 2300
Chicago, IL 60606-7519

Smith Financial, LLC
c/o William S. Smith, Manager
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Suite 1313
Oklahoma City, OK 73112-5466

US Bank
P.O. Box 5229
Cincinnati, OH 45201-5229

University Club of Chicago
76 E. Monroe Street
Chicago, IL 60603-2702

Wells Fargo Card Services
P.O. Box 30086
Los Angeles, CA 90030-0086

Wells Fargo Card Services
P.O. Box 30097
Los Angeles, CA 90030-0097

ABN AMRO Mortgage Group, Inc.
c/o Codilis & Associates, P.C.
15W030 North Frontage Road, Ste. 100
Burr Ridge, IL 60527-6921

B-Line, LLC
P.O. Box 91121
Dept. 550
Seattle, WA 58111-9221

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**FINAL APPLICATION OF SHAW FISHMAN GLANTZ &
TOWBIN LLC, AS COUNSEL FOR THE TRUSTEE, FOR ALLOWANCE
AND PAYMENT OF COMPENSATION AND REIMBURSEMENT
OF EXPENSES AND FOR RELATED RELIEF**

Shaw Fishman Glantz & Towbin LLC (“Shaw Fishman”), counsel to Ira Bodenstein in his capacity as chapter 7 trustee (the “Trustee”) of the bankruptcy estate of Patrick Y. Liu (the “Debtor”), applies to this Court (the “Application”) pursuant to 11 U.S.C. §§ 330 and 331, Federal Rules of Bankruptcy Procedure 2002(a)(6), 2002(i), 2016(a) and 9007, and Local Rule 5082-1 for the U.S. Bankruptcy Court for the Northern District of Illinois, for allowance and payment of \$13,129.50 in compensation for 37.20 hours of professional services rendered on behalf of the Trustee during the period of September 7, 2013, through June 30, 2014 (the “Application Period”), and reimbursement of \$444.21 in expenses incurred incidental thereto. In support of the Application, Shaw Fishman respectfully states as follows:

Introduction

1. The Court has core jurisdiction over this matter pursuant to 28 U.S.C. §§ 157(b)(2)(B) and (M) and 1334. Venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409.

2. On August 18, 2006 (the “Petition Date”), the Debtor filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”), thereby commencing the above-captioned bankruptcy case. On November 7, 2012, the Debtor converted his case to a case pursuant to chapter 7 of the Bankruptcy Code (the “Conversion Date”). Subsequent to the Conversion Date, the Trustee was appointed as chapter 7 trustee for the Debtor’s estate (the “Estate”).

Background

3. On September 20, 2013, the Trustee filed his *Application for Authority to Employ Counsel* [Dkt. No. 166] (the “Employment Application”), which sought approval of Shaw Fishman as the Trustee’s bankruptcy counsel. The Employment Application proposed that Shaw Fishman render the following legal services:

- a. Advise the Trustee with respect to his duties and powers in the Case;
- b. Assist and advise the Trustee with respect to the liquidation of the Estate’s interest in the Property;
- c. Assist and advise the Trustee in connection with claim resolution, if necessary; and
- d. Perform such other legal services as may be required and in the best interest of the Estate.

4. On October 2, 2013, the Court granted the Employment Application and entered its *Order Granting Trustee’s Application to Employ Counsel* [Dkt. No. 171], authorizing the Trustee to employ Shaw Fishman effective September 19, 2013 (the “Retention Order”).

Services Rendered by Shaw Fishman

5. Throughout the Application Period, Shaw Fishman rendered in excess of 37.0 hours of legal services to the Debtor having a value of \$13,129.50 for an average hourly rate of approximately \$352.00. Shaw Fishman provided professional services to the Trustee which were

consistent in scope to those approved by the Retention Order. All of the services for which compensation is requested were services which, in the exercise of Shaw Fishman's reasonable billing judgment, were necessarily rendered after due consideration of the expected costs and anticipated benefits of such services.

6. In an effort to provide the Court and parties in interest with understandable information concerning the amount and nature of Shaw Fishman's services during the Application Period, and in compliance with Local Bankruptcy Rule 5082-1, Shaw Fishman has classified its services into three separate categories, as follows:

Description	Total Hours	Total Fees Incurred
Case Administration	2.2	\$1,053
Retention Issues	3.1	\$1,395.00
Sale of Real Estate	31.9	\$10,681.50
Total	37.2	\$13,129.50

7. A detailed invoice ("Invoice") listing the time for each category is attached as Exhibit A to this Application. The following is a separate description of each of the Shaw Fishman categories which generally describes the tasks performed. The Invoice provides detailed descriptions of all services rendered in each of the above categories and the timekeeper, date and amount of time spent in each category. Summary charts for each category setting forth each professional who rendered services, the total time and value of services, and the total dollar value are provided herein.

A. Case Administration

8. Shaw Fishman spent 2.2 hours of professional services having a value of \$1,053.00 in connection with services pertaining to general case administration. Services

rendered by Shaw Fishman in this category included, drafting 2004 examination motions and appearing in Court to present them.

9. The chart below is a summary of the total amount of time entered by each timekeeper during the Application Period, as well as the corresponding dollar value of those services.

Professional	Hours	Amount
Ira Bodenstein	1.4	\$693.00
Richard M. Fogel	.8	\$360.00
TOTAL	2.2	\$1,053.00

B. Retention Issues

10. Shaw Fishman spent 2.2 hours of professional services having a value of \$990.00 in connection with services retaining Estate professionals. Services rendered by Shaw Fishman in this category generally included, among other things: (a) drafting and revising Shaw Fishman, Eldorrado Group and Popowcer Katten retention motions, and (b) appearing at hearings of all motions.

11. The chart below is a summary of the total amount of time entered by each timekeeper during the Application Period, as well as the corresponding dollar value of those services.

Professional	Hours	Amount
Richard M. Fogel	3.1	\$1,395.00
TOTAL	3.1	\$1,395.00

C. Sale of Real Estate

12. Shaw Fishman spent 31.9 hours of professional services having a value of \$10,681.50 in connection with services pertaining to the sale of the Estate's real estate. Services

rendered by Shaw Fishman in this category included, among other things: (a) drafting listing agreement and sale motion for 1267 Westgate and appearing in Court on the motion; (b) closing the sale of 1267 Westgate; (c) research on subordination issues related to sale of 1267 Westgate; (d) drafting sale agreement and sale motion for 155 Harbor Drive and appearing in Court on the motion; and (e) closing the sale of 155 Harbor Drive.

13. The chart below is a summary of the total amount of time entered by each timekeeper during the Application Period, as well as the corresponding dollar value of those services.

Professional	Hours	Amount
Bernard Thomas	.1	\$14.00
Patricia Fredericks	5.3	\$1,060.00
Jennifer Devroye	10.5	\$3,045.00
Jennifer L. Goldstone	6.0	\$1,950.00
Richard M. Fogel	7.5	\$3,375.00
Ira Bodenstein	2.5	\$1,237.50
TOTAL	31.9	\$10,681.50

Summary of Services Rendered by Professional

14. In summary, the total compensation sought for each professional with respect to the aforementioned categories is as follows:

Professional	Position	Hours	Hourly Rate	Fees
Bernard Thomas	Paralegal	0.10	140.00	\$14.00
Ira Bodenstein	Member	3.90	495.00	\$1,930.50
Patricia M. Fredericks	Paralegal	5.30	200.00	\$1,060.00
Richard M. Fogel	Of-Counsel	11.40	450.00	\$5,130.00

Jennifer Devroye	Associate	10.50	290.00	3,045.00
Jennifer L. Goldstone	Of-Counsel	6.00	325.00	1,950.00
Total		37.20		\$13,129.50

15. The hourly rates charged by Shaw Fishman compare favorably with the rates charged by other Chicago metropolitan firms having attorneys and paralegals with similar experience and expertise as the Shaw Fishman professionals providing services to the Trustee in connection with the case. Further, the amount of time spent by Shaw Fishman with respect to the case is reasonable given the difficulty of the issues presented, the time constraints imposed by the circumstances, the amounts at stake, and the ultimate benefit to the estate.

16. Whenever possible, Shaw Fishman has conscientiously attempted to avoid having multiple attorneys appear or confer on behalf of the Debtor. To the greatest extent possible, meetings, court appearances, negotiations and other matters were handled on an individual basis.

17. The results of Shaw Fishman's efforts have inured to the benefit of the estate. Given the criteria set forth in § 330, namely (a) the nature, extent and value of the services; (b) the time spent; (c) the rates charged for such services; (d) the performance of the services within a reasonable amount of time commensurate with the complexity, importance and nature of the problem, issue or task addressed; and (e) the reasonableness of the services based on the compensation charged by comparably skilled practitioners in other bankruptcy and non-bankruptcy matters, Shaw Fishman respectfully submits that the requested final compensation represents a fair and reasonable amount that should be allowed in full.

Expenses

18. The aggregate amount of expenses for which reimbursement is being sought is \$444.21. All of the expenses for which reimbursement is requested are expenses which Shaw

Fishman customarily recoups from its clients. An itemization of the expenses is included in the Invoice attached as Exhibit A. The types of costs for which reimbursement is sought are listed below:

Internal Photocopy	\$.10 per page
Postage\Federal Express	Actual cost
Westlaw Research	Actual cost
Filing Fees	Actual cost

19. The specific expenses for which reimbursement is requested during the Application Period are as follows:

Internal Photocopy	\$65.50
Postage	\$52.43
Westlaw Research	\$55.02
Filing Fees	\$250.00
Federal Express	\$21.26
Total	\$444.21

20. All expenses incurred by Shaw Fishman incidental to its services were customary and necessary. All expenses billed to the Trustee were billed in the same manner as Shaw Fishman bills non-bankruptcy clients. Further, the expenses for which reimbursement is sought constitute the types and amounts previously allowed by bankruptcy judges in this and other judicial districts.

Compliance with 11 U.S.C. § 504

21. Other than as provided for and allowed by 11 U.S.C. § 504, there is no agreement between Shaw Fishman and any other firm, person or entity for the sharing or division of any compensation paid or payable to Shaw Fishman.

Notice

22. As indicated in the attached Certificate of Service, Shaw Fishman provided approximately __ days' detailed notice of this Application to the U.S. Trustee, all creditors and

all parties requesting notice in this bankruptcy case via U.S. Mail, postage prepaid, and ___ days' detailed notice via CM/ECF. Shaw Fishman requests that this Court find the notice provided for herein sufficient and waive and dispense with any further notice requirements, pursuant to Rules 2002(a), 2002(i), and 9007 of the Federal Rules of Bankruptcy Procedure.

Conclusion

23. For these reasons, Shaw Fishman respectfully requests entry of an order, substantially in the form attached hereto, that:

- a. Allows Shaw Fishman \$13,129.50 in final compensation for the Application Period;
- b. Allows Shaw Fishman \$444.21 in expense reimbursement for the Application Period;
- c. Authorizing the Trustee to pay Shaw Fishman the entire amount of such allowed fees and expenses;
- d. Waives other and further notice of the hearing with respect to this Application; and
- e. Provides such other just and appropriate relief.

Dated: June 24, 2015

Respectfully submitted,

Shaw Fishman Glantz & Towbin LLC

By: /s/ Ira Bodenstein

Ira Bodenstein (#3126857)
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